

STATE OF ILLINOIS)
) SS
COUNTY OF COOK)

IN THE CIRCUIT COURT OF COOK COUNTY
COUNTY DEPARTMENT, CRIMINAL DIVISION

PEOPLE OF THE STATE OF ILLINOIS)
)
 Plaintiff,)
)
 vs.) Case No. **11CR-4138**
)
 TOWANDA WARE/WYNESTER LEWIS,)
)
 Defendants.)

**MOTION TO ADMIT VIDEOTAPED EVIDENCE DEPOSITION/
REPLY TO DEFENDANT WARE'S MOTION IN LIMINE TO EXCLUDE**

Now come the PEOPLE OF THE STATE OF ILLINOIS, by their Attorney, **ANITA ALVAREZ**, State's Attorney of Cook County, Illinois, through her Assistant, **Sherie L. DeDore**, and move this Honorable Court to enter an order in limine allowing the videotaped evidence deposition of Saint Barton to be admitted pursuant to Supreme Court Rule 804 (b) (1) and 725 ILCS 5/115-10.4. In support of their motion, the People state the following:

1. Saint Barton is the victim in this case and is deceased.
2. On May 20, 2009, a videotaped evidence deposition was taken of the victim Saint Barton in compliance with Supreme Court Rules 206 and 414. The testimony of Robert Bishop, Jr. was taken under oath and was subject to cross-examination.
- 3.

4. The People will provide the opportunity for confrontation and cross-examination of the witness to the defendants and their attorneys.

Wherefore, the People of the State of Illinois pray that the court allow the evidence deposition of Saint Barton by stenographic and audiovisual recording device and pursuant to order of this Court within (30) days.

ANITA ALVAREZ
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BY: _____
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